

NEVADA DIVISION OF ENVIRONMENTAL PROTECTION

FACT SHEET

(pursuant to NAC 445A.236)

Permittee: 255 North Sierra Street LLC
155 West Second Street
Reno, Nevada 89505-2071

Permit: NV0021121 – Renewal

Location: 255 North Sierra Street LLC
former Golden Phoenix Hotel and Casino
255 North Sierra Street
Reno, Nevada 89501

Latitude: 39° 31' 26" N

Longitude: 119° 43' 40" W

Township 19N, Range 19E, Section 11 MDB&M

Flow: 0.035 Million gallons per day (MGD) 30-day Average
0.044 MGD 7-day Average

General: The Permittee has applied for a National Pollutant Discharge Elimination System (NPDES) permit to continue to discharge treated groundwater from a basement sump at 255 North Sierra Street to the Truckee River via the City of Reno Sierra Street Stormdrain. An NPDES Permit for this discharge was first issued November 8, 1977 to the Del Webb Corporation for a discharge of 0.00058 cubic meters per second (0.012 MGD) from the Sahara Reno Hotel. The permit was subsequently reissued to the Reno-Hilton Hotel and Casino in May 1983, the Hilton Hotel and Casino in December 1988, the Flamingo Hilton Hotel and Casino in April 2001, and the Golden Phoenix Hotel and Casino in June 2003.

The building is being renovated to a condominium complex and includes a three-level, underground parking garage. Groundwater is collected at the lowest level of the garage, B-3, via an engineered system of foundation drainage piping. The drainage system discharges through outlets along the east, west and north walls of the garage. The collection system has been modified to pipe all of the captured groundwater to the 750-gallon sand filter/catch basin located at the south end of the garage. The perimeter troughs that route groundwater to the sand filter via floor drains are currently used to collect seepage through the floor expansion joints. During the term of this permit, an underdrain system that will discharge to the sand filter is scheduled to be constructed beneath the B-3 floor. This will provide for a safer environment for condominium residents and reduce the potential contamination of the discharge due to spills of automotive fluids, etc. in the garage. Concrete berms constructed to prevent cars from parking over the perimeter troughs will be retained to protect the exposed portion of the foundation drainage system.

The sand filter/catch basin receives all water from the groundwater collection system. This unit partially separates oils from the water. Water passing through the sand filter flows to the lift station sump. The lift station is located in a separate room in the garage. Two submersible pumps are actuated by a float system. Alarm signals are relayed to the security office for high level and pump failure. Totalizing flow meters are located on the discharge mains for each of the two pumps.

The total nitrogen and total phosphorous concentrations of this discharge were not monitored at the time of the 1994 Truckee River Total Maximum Daily Load (TMDL) development. Discharge from this facility has been included in the Truckee River Total Maximum Daily Load (TMDL) document, approved by the U.S. Environmental Protection Agency April 1994, as a background source.

Low levels of Tetrachloroethylene (PCE), Trichloroethylene (TCE), Freon 112, Methyl tert-butyl ether (MTBE) and 1,2 Dichloroethane (1, 2-DCA) were detected in the groundwater underlying downtown Reno during a regional groundwater study performed by Simon Hydro-Search, Inc. in November 1991 and EMA in August 1992. Washoe County has created the Central Truckee Meadows Remediation District to address the PCE contamination.

Receiving Water Characteristics: The treated groundwater is discharged to the Truckee River via the stormdrain system. The Truckee River at East McCarran, NAC 445A.186, standards apply for this stream segment. Waters of the Truckee River are of good quality in the segment. Beneficial uses of the Truckee River from Pyramid Lake to the state line are: irrigation; watering of livestock; recreation involving contact with the water; recreation not involving contact with the water; industrial supply; municipal or domestic supply, or both; propagation of wildlife; and propagation of aquatic life. From Idlewild to East McCarran, the aquatic life of major concern are all life stages of mountain whitefish, rainbow trout and brown trout, NAC 445A.183.8(c).

The Bureau of Water Quality Planning database does not include recent water quality data for this reach of the River, so data from the upstream monitoring point, Truckee River at Idlewild Park, has been utilized. The River meets all of the NAC 445A.186 water quality standards for beneficial uses. In 2005, the River met the majority of the NAC 445A.186 annual average requirements to maintain existing higher quality (RMHQ) at the upstream monitoring point.

<u>Parameter</u>	<u>RMHQ</u>	<u>2005 Average</u>
pH (SU)	7.0 – 8.5	7 of 12 exceeded RMHQ
Chlorides (mg/L)	7.0 ¹	7.7
Total Phosphates (mg/L)	0.05 ¹	0.024
Ortho Phosphate (mg/L)	0.02 ¹	0.006
Total Nitrogen (mg/L)	0.3 ¹	0.25
Total Dissolved		
Solids (mg/L)	90 ¹	85
Turbidity (NTU)	6.0 ¹	3.5
Fecal Coliform (No./100 ml)	75 ²	35
Total Suspended		
Solids (mg/L)	15.0 ¹	8.4
Sulfate (mg/L)	7.0 ¹	8.9

Notes:

1. Annual average
2. Annual geometric mean.

Quantities: Using the average reported flow from the 4th quarter of 2002 through the 1st quarter of 2007, 0.0013 MGD, and the average concentration of constituents of concern from the same time period, total nitrogen as nitrogen (TN) 3.7 mg/L and total phosphorus as phosphorus (TP) 0.17 mg/L, the following quantities were calculated: TN 0.04 lb/day and TP 0.002 lb/day. These values are well below 1.0 lb/day and meets the de minimis policy for TN and TP. The 1.0 lb/day TN and 0.02 lb/day TP load limitations have been retained from the current permit.

The current permit does not limit the total dissolved solids load. Since a significant portion of the Truckee River TDS TMDL has not yet been assigned to load allocations or wasteload allocations, the draft permit does not contain a daily TDS load limitation.

Compliance History: Based on the Division's Compliance Database for the period from the 2nd quarter of 2002 through the 1st quarter of 2007, the Permittee has correctly monitored and reported the discharge only 45% of the time; compliance prior to April 2002 is not tracked in the database for this permit. The most

Schedule of Compliance: The Permittee shall implement and comply with the provisions of the schedule of compliance after approval by the Administrator, including in said implementation and compliance, any additions or modifications which the Administrator may make in approving the schedule of compliance.

- a. The Permittee shall achieve compliance with the effluent limitations upon issuance of the permit.
- b. Within fifteen (15) days of the completion of construction of the underdrain system, the Permittee shall notify the Division of such completion.
- c. Within sixty (60) days of the completion of construction of the underdrain system, the Permittee shall submit a revised Operations and Maintenance Manual to the Division for review and approval.

Rational for Permit Requirements: Monitoring is required to assess the quality of the discharge water and to ensure that the extracted groundwater will not impact the beneficial uses of the Truckee River.

Flow: The current permit includes daily maximum, 0.044 MGD, and 30-day average, 0.035 MGD, flow limitations but only monthly reading of the two flow meters. The 30-day average limit has been retained but the daily maximum limit has been changed to a 7-day average with weekly monitoring of the flow meters.

From the 4th quarter of 2002 through the 1st quarter of 2007, the maximum 30-day average reported discharge from the facility was 0.0078 MGD in March 2007. During this time period, the discharge has averaged 0.0013 MGD with no discharge in February and March 2004.

Total Nitrogen as Nitrogen and Total Phosphorus as Phosphorus: The total nitrogen and total phosphorus load limitations are explained in the Quantities section of this fact sheet. The TN and TP load limitations, 1.0 lb/day and 0.02 lb/day respectively, have been retained from the current permit.

Part I.A.2. allows the TP load to be increased to a maximum of 1.0 lb/day as a minor modification. This condition is consistent with the current permit.

The current permit does not limit the concentration of these constituents and concentration limits are not proposed in the draft permit.

Total Dissolved Solids: The lack of a total dissolved solids (TDS) load limitation in the draft permit is explained in the Quantities section of this fact sheet. The TDS load is not limited in the current permit.

The NAC 445A.186 standards of water quality include TDS RMHQs of 90.0 mg/L, annual average, and 120.0 mg/L, single value, and a beneficial use standard of 500 mg/L, annual average.

Annual TDS analyses with an effluent discharge limitation of 500 mg/L is required by the current permit. From the 4th quarter of 2002 through the 1st quarter 2007, the average discharge TDS concentration was 310 mg/L. To be consistent with the regulation of TN and TP, the TDS concentration limit has not been included in the proposed permit.

Total Petroleum Hydrocarbons: Monthly analysis for total petroleum hydrocarbons (TPH), EPA Method 8015, modified to detect extractable fuel hydrocarbons, was added to the permit September 2, 1998, in response to a recommendation from a site inspection. There has been one TPH detection, 0.24 mg/L in February 2006, during the term of the current permit. Continued TPH monitoring is required due to historic leakage from underground storage tanks (USTs) in downtown Reno, but the measurement frequency has been conditionally reduced to quarterly. If there are any TPH detections in consecutive quarters, the measurement frequency reverts to monthly. After twelve consecutive monthly analyses without detection of TPH in the

discharge, the Permittee may resume quarterly TPH analyses.

The City's receiving stormdrain flows pass through an oil/water separator prior to discharge to the Truckee River.

EPA Method 8260: Although not detected in the Permittee's discharge during the term of the current permit, quarterly analysis for volatile organic compounds is proposed to be continued in the draft permit.

Limitations on the tetrachloroethylene (PCE) and trichloroethylene (TCE) concentrations in the discharge have been retained in the draft permit because these compounds have been detected in the dewatering discharge of other properties within the Remediation District.

Under the previous permit, chloroform was frequently detected in the discharge until the Permittee's laboratory raised the detection level to 5.0 µg/L. The current permit limits the chloroform concentration in the discharge to 80 µg/L. NAC 445A.144 does not include a chloroform standard, but does include a total trihalomethanes (THM) municipal or domestic supply standard of 100 µg/L. Chloroform is a component of THM. Nevada does not have an aquatic life standard for THM. Therefore, the chloroform limitation is proposed to be replaced by the THM limitation.

Proposed Determination: The Division has made the tentative determination to issue the proposed permit for a five (5) year period.

Procedures for Public Comment: The Notice of the Division's intent to issue a permit authorizing the Permittee to continue to discharge treated groundwater to the Truckee River subject to the conditions contained within the permit, is being sent to the **Reno Gazette-Journal** for publication. The notice is being mailed to interested persons on our mailing list. Anyone wishing to comment on the proposed permit can do so in writing until 5:00 PM August 17, 2007, a period of 30 days following the date of the public notice. The comment period can be extended at the discretion of the Administrator.

A public hearing on the proposed determination can be requested by the applicant, any affected State, any affected interstate agency, the Regional Administrator of EPA Region IX or any interested agency, person or group of persons. The request must be filed within the comment period and must indicate the interest of the person filing the request and the reasons why a hearing is warranted. Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the proposed discharge or any other area the Administrator determined to be appropriate. All public hearings must be conducted to accordance with NAC 445A.238.

The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.238.

Prepared by: Bruce Holmgren
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